

**REMARKS**

Claims 1-5 are pending in this application. Reconsideration is respectfully requested in view of the following remarks.

**I. Rejection under 35 U.S.C. §112, Second Paragraph**

The Office Action rejects claims 1-5 under 35 U.S.C. §112, second paragraph, as being indefinite. In particular, the Office Action asserts that the feature "at least one of the inkjet head" in each claim has insufficient antecedent basis based on the disclosure. Thus, the Office Action asserts that this feature should be "a plurality of inkjet heads." Applicants respectfully traverse the rejection.

Applicants respectfully submit that the specification provides support for this feature in various paragraphs throughout the specification. For example, paragraph [0045] discloses "In Fig. 8...a first-scanning driving unit 19 for moving the inkjet head 22 in the first-scanning direction relative to the mother substrate 12...." Therefore, withdrawal of the rejection under 35 U.S.C. §112, second paragraph, is respectfully requested.

**II. The Claims Define Patentable Subject Matter**

The Office Action rejects claims 1-5 under 35 U.S.C. §102(b) over EP 0 754 553. Applicants respectfully traverse the rejection.

In particular, EP 0 754 553 does not disclose or suggest at least one of an inkjet head and a substrate is moved in a second-scanning direction relative to the other so that at least a part of each nozzle group is capable of scanning a same section of the substrate in a first direction, as recited in independent claim 1. Independent claims 2-5 recite similar features.

EP 0 754 553 instead discloses on Fig. 19 and at col. 9, lines 12-41, an apparatus having a plurality of ink-jet heads (120a, 120b, 120c) for different colors, each having a plurality of ink-jet discharging nozzles arranged in the Y-axis direction, each ink-jet head having a first ink discharging nozzle group, in which a pitch of the plurality of ink

discharging nozzles in the Y-axis direction is set to be equal to a pitch of pixels of the same color in the Y-axis direction, and a second ink discharging nozzle group having a nozzle pitch set to be equal to the pixel pitch in the Y-axis direction like the first ink discharging nozzle group and control means for causing each of the ink-jet heads to discharge an ink while scanning the ink-jet head in the X-axis direction, and coloring all the pixels by scanning the ink-jet head once or a plurality of numbers of times in the X-axis direction.

However, nowhere does EP 0 754 553 disclose or suggest the above-mentioned features of the claims.

Therefore, independent claims 1-5 define patentable subject matter. Accordingly, withdrawal of the rejection under 35 U.S.C. §102(b) is respectfully requested.

### **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-5 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Yong S. Choi  
Registration No. 43,324

JAO:YSC/jam

Date: November 2, 2004

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

**DEPOSIT ACCOUNT USE  
AUTHORIZATION**

Please grant any extension  
necessary for entry;

Charge any fee due to our  
Deposit Account No. 15-0461